

Investigation by the Department of Telecommunications and Energy  
on its own motion, pursuant to G.L. c. 159, §§ 12 and 16,  
into the collocation security policies of Verizon New England, Inc.  
d/b/a Verizon Massachusetts

Pursuant to 220 C.M.R. §1.03(1), WorldCom, Inc. (“WorldCom”), on behalf of itself and its affiliated entities that provide telecommunications services in Massachusetts, hereby petitions the Department of Telecommunications and Energy (the “Department”) for leave to intervene as a party in this proceeding. WorldCom’s principal offices are located at 500 Clinton Center Drive, Clinton, Mississippi 39056. As grounds for its Petition, WorldCom states as follows:

1. Through various operating subsidiaries, WorldCom is authorized to offer domestic interstate, intrastate, local and international telecommunications services in each of the fifty states and the District of Columbia, and is a common carrier of telecommunications services authorized by the Department to provide interLATA and intraLATA services in Massachusetts. As a facilities-based carrier in Massachusetts, WorldCom has a significant number of collocation arrangements with Verizon in which WorldCom-owned telecommunications equipment is physically situated in Verizon-owned facilities. The Department, on its own motion, has opened an investigation into collocation security in Massachusetts. This investigation could impact the terms and conditions under which WorldCom leases collocation services from Verizon.
2. As a current and potential future customer of Verizon's collocation services in

Massachusetts, WorldCom seeks to protect its interests by participating herein.

WorldCom's interests in this matter cannot be adequately addressed or represented by any other party.

3. WorldCom has participated in other dockets of critical importance to the rates, terms and conditions of Verizon's collocation services in Massachusetts, including the *Consolidated Arbitrations* dockets, D.P.U. 96-73/73, et al., several phases of D.T.E. 98-57, and D.T.E. 01-20.
4. For the foregoing reasons, and for the same reasons that it was granted leave to intervene in prior Departmental dockets relating to collocation, WorldCom will be substantially and specifically affected by the Department's review and decision in this docket.
5. WorldCom intends to fully participate in the proceedings in this docket and may, as necessary, conduct discovery, present witnesses, cross-examine witnesses, present legal arguments, and file briefs or other pleadings to protect its interests.

WHEREFORE, WorldCom respectfully requests leave to intervene in this proceeding.

Respectfully submitted,

WORLDCOM, INC.

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Dated: New York, New York  
February 8, 2002

**COMMONWEALTH OF MASSACHUSETTS**

## DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. 02-8

## APPEARANCE OF COUNSEL

In the above-captioned proceeding, the undersigned hereby appears for and on behalf of WorldCom, Inc. and its affiliated entities that provide telecommunications services in Massachusetts.

Respectfully submitted,

WORLDCOM, INC.

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Dated: New York, New York  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing upon each person designated on the attached service list by email and either U.S. mail or overnight courier.

Dated: New York, New York  
February 8, 2002

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